

**REMARKS**

The foregoing amendments and remarks are in response to the Office Action dated January 24, 2008. This amendment is filed with a request for a one month extension of time. Authorization to charge the appropriate fee to Deposit Account No. 50-0951 is filed herewith.

At the time of the Office Action, claims 85-134 were pending in the application. In the Office Action, objections were raised to claims 85, 93, 95, 105, 107, 113, 115, 124, 133 and 134. Claims 85-134 were rejected under 35 U.S.C. §102(e). Claims 88, 100, 108, 117 and 126 were rejected under 35 U.S.C. §103(a). The objections and rejections are discussed in more detail below.

**I. Claim Objections**

Claims 85, 95, 107, 115, 124, 133 and 134 were objected to due to lack of a structural cooperative relationship. These claims are duly amended herein, and are now believed to clearly recite the relationship between the components. Claims 93, 105 and 113 were objected to due to a lack of antecedent basis within the claim or that from which the claims are dependent on. Claims 93, 105 and 113 are cancelled herein. Withdrawal of the objections is thus respectfully requested.

**II. Claim Rejections Based on Art**

Claims 85-134 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,796,696 to Taniuchi (hereafter "*Taniuchi*").

*Taniuchi* describes the first preferred embodiment described therein as follows:

[0171] FIGS. 1-3 show a vehicle light 10 according to a first preferred embodiment of the present invention. The vehicle light 10 is configured as a vehicle light disposed at a left front side of a vehicle, and comprising a light bulb 11 having as a light source, a major reflecting surface 12 located to surround the light bulb 11, a first reflecting surface 13, a second reflecting surface 14, a third reflecting surface 15, a fourth reflecting surface 16, and a fifth reflecting surface 17, a projection lens 18, a shutter 19 and a front lens 20. The first through fifth reflecting surfaces are respectively located outside of the major reflecting surface 12. Among above-described elements, all elements except the second reflecting surface 14 are fixed in their respective positions. The second reflecting surface 14 is movable. In FIG. 1, there exists a step between the fourth reflecting surface 16 and the fifth reflecting surface 17. However, the fourth

reflecting surface 16 and the fifth reflecting surface 17 can be formed as a continuous surface. *[Emphasis added.]*

FIGS. 1 and 2 of *Taniuchi* are reprinted below.

Fig.1

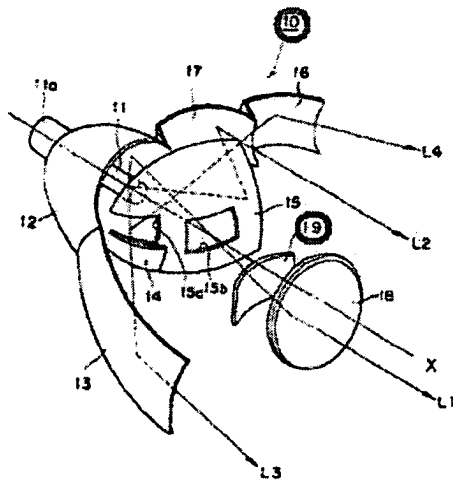
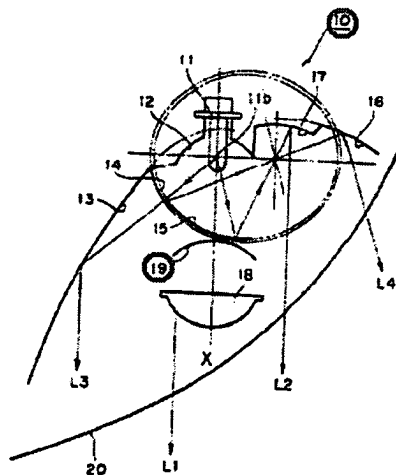


Fig.2



Reference numerals 10 and 19 are circled in the figures. These highlight the vehicle light 10 and the shutter 19.

The shield 9 of the present application is similar to the shutter 19 of the *Taniuchi*. However, the shield 9 of the present application serves as both an obstacle and a reflector while the shutter 19 serves only as an obstacle. From Fig 10 of the present application, it can be seen that the light rays coming from the light source and the reflector section 3 are reflected to the reflective surface 11.

The shield 9 is placed so that its upper end is at the same horizon with the lower end of the semi shutter 6. This structure yields a full concealment of the light source and the other reflective surfaces. A person who tries to look at the headlamp from the front of the vehicle cannot see the light source, because the light rays are prevented from being transmitted through the upper part of the lens by the semi shutter 6, and are prevented from being directly transmitted through the lower part of the lens by the shield 9. The light is scattered in a controlled way from the shield 9 to a reflective surface 11 and then down onto the road surface by being transmitted through the lower half of the lens, allowing a person outside the vehicle awareness of the vehicle without being dazzled by the headlamp. However, in *Taniuchi's* solution, all reflective surfaces can be seen by a person looking at the headlamp from the outside.

The half-lens illumination principle is a new optical approach which was put forward by Applicant. With this principle, a lamp can be used for illumination without its light source and reflective surfaces being directly viewable from the outside the lamp. When this principle is applied to a headlamp structure, which is the subject matter of the present patent application, using a half lens of the headlamp is sufficient in order to achieve enough illumination of the necessary road surface in front of a vehicle. Therefore a new approach has been raised with this application namely half-lens illumination principle. With this optical illumination principle, the lower half part of the lens with respect to the XX horizontal plane passing through the optical center of said lens is used. Therefore, optically, the light rays do not pass above the XX plan.

In this approach, with a semi-shutter piece, the upper half of the lens becomes useless. All light rays produced by the light source are directed through the lower half of the lens by the reflective surface 2, 3, 11, the shield 9 and the semi-shutter 6.

Using a half lens as stated above is not indicated or even can not be implied by the *Taniuchi*.

The shutter of *Taniuchi* is described as stated below:

The shutter 19 prohibits a portion of light rays converged in the vicinity of the focus of the projection lens 18 which is unnecessary for the formation of a light distribution pattern. The prohibited portion of light rays by the shutter 19 forms a cut-off portion of the light distribution pattern. By adjusting the shape of the shutter 19, location of a cut-off line of the light distribution pattern can be adjusted. The focused image of light in the vicinity of the focus of the projection lens 18 is constituted by light rays coming directly from the filament 11 b and that have passed through the second aperture 15b, and light rays reflected by the major reflecting surface 12 and that have passed through the second aperture 15b.

However, at the paragraph 49 of the present application, the shield and its 45° angle by its movements can be seen to be different from said shutter of *Taniuchi*. When the shield of the present application is at 45° with respect to the XX horizontal plane, light rays coming from the light source are reflected to the reflective surface 11, but when it is in an open position or parallel to the XX plane the light rays are directed through the lens. This 45° angle represents an allocation of the shield 9 of the present application with respect to the XX plane, however the 45° angle of the shutter of *Taniuchi* shows a cut-off angle.

Moreover the semi-shutter 6 of the present claims is totally different from the shutter 19 of *Taniuchi*. The semi-shutter 6 of the present application is an essential part. It totally conceals the light source and reflective surfaces of the headlamp while covering the upper half of the lens. When the whole teaching of *Taniuchi* is examined carefully, it can be seen that there is no hint or suggestion of the semi-shutter 6 recited in the present claims in *Taniuchi*.

In the *Taniuchi* lamp, the light shield (shutter 19, 54, 69, 89) which is embodied on the light passageway is a headlamp element used in all standard projection type lamps having the purpose of diminishing glaring effects. The purpose of this light shield is optically to provide a cut-off line and to prohibit the light rays from shining directly at oncoming traffic users so as to decrease glaring effects. This light shield can be fixed or mobile. It can be embodied with one part or plural of parts.

Thus, Applicant is of the opinion that various differences of the present claims and *Taniuchi* can be summarized as below:

- the shutter piece of *Taniuchi* is totally different from the present application as discussed above.

- the shutter piece of *Taniuchi* only resembles the shield part of the present application, however their movements are different because the shutter of *Taniuchi* is laterally moved whereas the shield of the present application is vertically moved. Therefore these movements have different results.
- the semi-shutter piece of the present claims is not disclosed or even implied by *Taniuchi*. This piece covers the upper half of the lens. This semi-shutter with the shield are used to achieve a total concealment of the light source and reflective surfaces from the oncoming traffic users. *Taniuchi* does not hint or suggest this idea.
- the present invention can be established without any shield part (see for example, claim 107 *et seq*). When the end of the lower reflector section 2 and the focal points  $f_2$ ,  $f_4$  are put at the same point, the same results can be achieved without using any shield part.

Therefore all claims differ from and are not anticipated by nor rendered obvious by the disclosure of *Taniuchi*. The claims are thus believed to relate to patentable subject matter, and to be in condition for allowance.

### III. Conclusion

Applicant has made every effort to present claims which distinguish over the prior art, and it is thus believed that all claims are in condition for allowance. Nevertheless, Applicant invites the Examiner to call the undersigned if it is believed that a telephonic interview would expedite the prosecution of the application to an allowance. In view of the foregoing remarks, Applicants respectfully request reconsideration and prompt allowance of the pending claims.

Respectfully submitted,

Date: 5/27/08

/Sarah E. Smith/  
Mark D. Passler  
Registration No. 40,764  
Sarah E. Smith  
Registration No. 50,488  
**AKERMAN SENTERFITT**  
Post Office Box 3188  
West Palm Beach, FL 33402-3188  
Telephone: (561) 653-5000